

For Clerk's Office Use

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For use by inmates in filing a complaint under CIVIL RIGHTS ACT, 42 USC § 1983

INMATE NAME: DeAndre L'overture Jackson

PRISONER NO.: 1145411

PLACE OF CONFINEMENT: Red Onion State Prison

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA

DeAndre L'overture Jackson

Enter Full Name Plaintiff

vs.

David Robinson; Gail R. Jones; David Zook

Rick White and M. Foster; M. Younce; Nicole Deel

Enter Full Name(s) Defendant(s)

JUN 07 2016

JULIA C. DUDLEY, CLERK  
BY: DeAndre  
DEPUTY CLERK

CIVIL ACTION NO. 7:16-cv-00263

A. Have you begun other actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes  No

B. If your answer to A is Yes, describe the action in the space below.

1. Parties to the Action: Harold M. Clarke

2. Court: United States District Court for Eastern District of VA

3. Docket No.: 2:16cv55

4. Judge: Honorable Douglas Miller

5. Disposition: N/A

(For example, is the case still pending? If not, what was the ruling? Was the case appealed?)

C. Have you filed any grievances regarding the facts of your complaint?

Yes  No

1. If your answer is Yes, complete the enclosed verified statement, indicating the result. Please attach evidence of your exhaustion of all available grievance procedures.

2. If your answer is No, indicate the reason for failure to exhaust on the verified statement. You may be required to exhaust your claims through any applicable grievance procedures. Your complaint may be dismissed if you fail to exhaust all avenues of the grievance process in a timely fashion.



Attention: Claim #4 is on the BACK SIDE of this paper

D. Statement of Claim - State here briefly the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. Use as much space as needed. You may attach extra paper if necessary.

Megligence is my Claim #1 - Supporting Facts - Tell your story briefly without citing cases or law. On March 17, 2016

The Central Classification Service, CCO David Robinson, Gail R. Jones and Sussex I state prison warden David ZOOK and operations officer M. Foster and Rick White did scheme & falsify documents denying me Due Process of the 5th U.S.C.A when I was denied to be present at my ICA hearing for a security level increase and transfer that was supposed to have been held on March 17, 2016

Discrimination is my Claim #2 - Supporting Facts - Tell your story briefly without citing cases or law. On March 17, 2016

The Central Classification Service, CCO David Robinson, Gail R. Jones and Sussex I state prison warden David ZOOK, Rick White and operations officer M. Foster did deny me Due process, depriving me of liberty governed by the 5th U.S.C.A by increasing my security level and transferring me to a higher security level prison, without a ICA hearing, and I do not fit the criteria for a security increase nor transfer

Discrimination is my Claim #3 - Supporting Facts - Tell your story briefly without citing cases or law. for cruel and unusual punishment violating my 8th U.S.C.A right On March 22, 2016 that was committed by Central Classification Service, CCO David Robinson, Gail R. Jones and Sussex I state Prison warden David ZOOK, Rick White and operations officer M. Foster by transferring me to a higher security

level prison, when I DO NOT meet the criteria to be housed at a security level 5 prison in which is maximum security for inmates with bad disciplinary problems such as behavior and institutional infractions, with 34 or higher security level points, and I have none of the following:

E. State what relief you seek from the Court. Make no legal arguments, cite no cases or statutes.

in imminent danger for Injunctive relief: transfer to a security level 3 prison, in the eastern Virginia

Compensatory damages \$100,000.00 and punitive damages \$75,000.00 each defendant

SIGNED THIS 18<sup>th</sup> DAY OF May, 2016.

DeAndre L'Overture Jackson

with Power of Attorney in fact  
(Signature of Each Plaintiff)

**VERIFICATION:**

I, DeAndre L'Overture Jackson, state that I am the plaintiff in this action and I know the content of the above complaint; that it is true to my own knowledge, except as to those matters that are stated to be based on information and belief, and as to those matters, I believe them to be true. I further state that I believe the factual assertions are sufficient to support a claim of violation of constitutional rights. Further, I verify that I am aware of the provisions set forth in 28 USC § 1915 that prohibit an inmate from filing a civil action or appeal, if the prisoner has, three or more occasions, while incarcerated, brought an action or appeal in federal court that are dismissed on the grounds that it was frivolous, malicious or failed to state a claim upon which relief may be granted, unless the prisoner is in imminent danger of serious physical injury. I understand that if this complaint is dismissed on any of the above grounds, I may be prohibited from filing any future actions without the pre-payment of filing fees.

I declare under penalty of perjury the foregoing to be true and correct.

DATED: May 18, 2016 SIGNED: D

D. L. Jackson  
D. L. Jackson

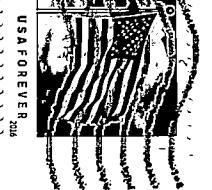
Negligence of their operations is my Claim #4, which is a Due Process violation of my 5th U.S. Constitutional Amendment right that was committed on April 4, 2016 by Red Onion State prison (staff) Unit Manager M. Younce and Counselor N. Deel when they refused to give me the external documents that supposed to have sent me to Red Onion State prison from the ICA hearing of March 17, 2016, Also for the fact of allowing me to be housed at Red Onion state prison while denying to give me an interim review for a transfer to a security level 3 prison, due to the fact that I am lawfully a security level 3 prisoner with 9 security level points and 2 plus years without an institutional infraction, whereas Red Onion state Prison is used to house inmates with 34 and more security level points with the fact that an institutional infraction brought them to be housed at Red Onion state Prison. Younce and Deel have Breached their Contract(s) of VA operating procedure 830.1 IV A. 2 (ii)

Negligence of their operations is my Claim #5, for the Central Classification Services, CCO, David Robinson, and sussex I state prison warden David Zook and operations officer M. Foster violating the Virginia Constitution Bill of Rights Article(s) I section(s) # 1, 7 and 8 violating my 5th United States Constitutional Amendment of Due Process when they denied me of my liberty and property on March 16, 2016, by taking my external documents in which I am the beneficiary to and have Power of Attorney in fact to conduct and have exclusive charge of all my tax, legal, and business affairs, so that I could receive the benefits from my trust and savings account to pay for my filing fee of my 28 U.S.C.G 2254, AD SUBSTICIENDUM Habeas Corpus petition action # 2:16cv55, that was dismissed by the United States District Court of Virginia for the eastern District on May 3, 2016, due to the fact(s) I could not afford and/or have the U.S. currency or means to pay the filing fee

DeAndre L. Jackson #1145411  
Red Onion State Prison  
P.O. Box 1900  
Pound, VA. 24279

KNOXVILLE TN 379

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United States District Court of Virginia  
for the Western District

210 Franklin Road SW, Suite 580  
Roanoke, VA. 24011 - 2208

24011-220840

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JUN 06 2016

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Mail Room